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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL RICHARD LYNCH AND  
STEPHEN KEITH CHAMBERLAIN

Defendants.

CASE NO. 3:18-cr-00577-CRB

**Declaration of Gary S. Lincenberg in  
Support of Defendant Stephen  
Chamberlain's Joinder in Defendant  
Michael Lynch's Motion to Compel and for  
Related Relief [ECF 272]**

Date: January 10, 2023

Time: 10:00 a.m.

Place: Courtroom 6

Assigned to Hon. Charles R. Brever

**DECLARATION OF GARY S. LINCENBERG**

I, Gary S. Lincenberg, declare as follows:

1. I am an active member of the Bar of the State of California and a Principal with Bird, Marella, Boxer, Wolpert, Nessim, Dooks, Lincenberg & Rhow PC, attorneys of record for Defendant Stephen Keith Chamberlain in this action. I make this Declaration in support of Mr. Chamberlain's joinder in Defendant Michael Lynch's Motion to Compel and for Related Relief. Except for those matters stated on information and belief, I make this Declaration based upon personal knowledge and, if called upon to do so, I could and would so testify.

2. Attached as **Exhibit 1** is a true and correct copy of the Government's Exhibit List, dated December 8, 2023.

3. Attached as **Exhibit 2** is a true and correct copy of the Government's Witness List, dated December 15, 2023.

4. Attached as **Exhibit 3** is a true and correct copy of a Government PowerPoint slide titled, "Balance Sheet of Fraud," bearing the Bates number USAO\_GJTX00006063. Upon information and belief, this is the same slide that the Government used in its closing arguments in *United States v. Hussain*.

5. Attached as **Exhibit 4** is a true and correct copy of the Government's Expert Report, prepared by Steven Brice.

6. In a meet and confer call with AUSA Adam Reeves on December 21, 2023, we proposed the Government simply produce all of the documents on its exhibit list in the form it intends to use them at trial. Mr. Reeves advised that we should not expect to receive a production of trial exhibits with appropriate exhibit markings prior to the Rule 15 depositions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that I executed this Declaration on December 26, 2023, at Los Angeles, California.

/s/Gary S. Lincenberg  
Gary S. Lincenberg